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March 17, 2022

VIA CM/ECF & E-MAIL

bowbeer_chambers@mnd.uscourts.gov

The Honorable Hildy Bowbeer
Magistrate Judge
United States District Court of Minnesota
316 North Robert Street
St. Paul, MN 55101

Re: *Walsh, et al. v. Buchholz, et al.*, Civil No. 0:19-cv-1856 (DSD/HB)

Dear Judge Bowbeer,

This joint correspondence follows up on the Court's Order Amending Pretrial Scheduling Order (Doc. No. 104), dated January 31, 2022 (the "Scheduling Order"). Consistent with the Scheduling Order, the parties conducted several additional expert depositions in recent weeks. Unfortunately, due to expert scheduling conflicts and unforeseen weather-related delays, the parties were unable to complete all of the expert depositions prior to the March 11, 2022, expert discovery deadline set forth in the Scheduling Order.

The parties and their respective experts are working as diligently as possible to complete the remaining expert depositions. The remaining depositions have all been scheduled and will proceed on the following dates: March 25, 2022 (Plaintiffs' Expert); April 13, 2022 (Defendants' Expert); April 22, 2022 (Defendants' Expert); and April 28, 2022 (Defendants' Expert).

Although the parties want to apprise the Court of these developments, they do not seek any additional modification of the Scheduling Order at this time. Counsel are available for a telephonic status conference in the event the Court would like to discuss any of the matters set forth above.

Sincerely,

/s/ Stephen J. Oddo

/s/ Suzanne L. Jones

/s/ Mark T. Berhow

cc: All counsel of record

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